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December 21, 2022

VIA ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED

SO ORDERED *[Signature]*

VERNON S. BRODERICK

U.S.D.J. 12/22/2022

By January 16, 2023, Plaintiff shall file a status update regarding whether or not he has made contact with Defendant and any insight he may have into whether Defendant has retained counsel in this matter.

Re: *McDermott v. VIP Connected Entertainment, LLC*, 1:22-cv-08307 (VSB)

Dear Judge Broderick:

We represent Plaintiff Matthew McDermott ("Plaintiff") in the above-captioned case. We write pursuant to Section 1.G of the Court's Individual Rules & Practices to respectfully request a thirty (30) day extension of time for Plaintiff to file his application for default judgment.

- (1) the original deadline is December 23, 2022 [Dkt. No. 10]
- (2) no previous requests for an extension have been made;
- (3) no previous requests were granted or denied;
- (4) Defendant is in default and therefore neither consents to nor opposes the requested relief;
- (5) Plaintiff seeks a extension to afford him more time to attempt to contact defendant prior to filing his motion.

No other scheduled dates will be impacted by this request.

Respectfully Submitted,

s/jameshfreeman/
James H. Freeman

Counsel for Plaintiff